

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

LECLAIRRYAN PLLC,

Debtor.¹

Chapter 11

Case No. 19-34574 (KRH)

**PROPOSED FIRST DAY AGENDA FOR HEARING
ON SEPTEMBER 3, 2019 AT 1:00 P.M. (PREVAILING EASTERN TIME)**

I. INTRODUCTION

In support of the following relief requested at the first day hearing, LeClairRyan PLLC, the above-captioned debtor and debtor-in-possession (the “Debtor” or “LeClairRyan”), refers the Court to the Declaration of Lori D. Thompson, Esq. in Support of Chapter 11 Petition and First Day Motions [ECF No. 3].

II. ADMINISTRATIVE MOTIONS

1. “**Motion to Expedite**” – *Motion of LeClairRyan PLLC for Entry of an Order Setting an Expedited Hearing on “First Day Motions” and Related Relief* [ECF No. 15]
2. “**Notice of Commencement**” – *Motion of LeClairRyan PLLC for Entry of an Order (I) Approving the Form and Manner of Notice of Commencement of the Chapter 11 Case and (II) Waiving the Requirement that the Debtor Submit a Formatted Mailing Matrix* [ECF No. 4]

¹ The last four digits of the Debtor’s federal tax identification number are 2451.

HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Tyler P. Brown (VSB No. 28072)
Jason W. Harbour (VSB No. 68220)

*Proposed Counsel to the Debtor
and Debtor in Possession*

3. **“Extend Schedules Deadline”** – *Motion of LeClairRyan PLLC for Entry of an Order (I) Extending the Time to File Schedules and Statements of Financial Affairs and (II) Extending the Time to Schedule the Meeting of Creditors* [ECF No. 5]
4. **“Case Management”** – *Motion of LeClairRyan PLLC for Entry of an Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF No. 6]

III. OPERATIONAL MOTIONS

5. **“Cash Management”** – *Motion of LeClairRyan PLLC for Entry of an Order (I) Authorizing the Debtor to Maintain Existing Bank Accounts and Business Forms and Continue to Use Existing Cash Management System and (II) Waiving the Requirements of Section 345(b) of the Bankruptcy Code* [ECF No. 7]
6. **“Assumption Motion”** – *Omnibus Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Authorizing the Debtor to Assume Certain Executory Contracts* [ECF No. 12]
7. **“Motion to Seal”** – *Motion of LeClairRyan PLLC Pursuant to Sections 105 and 107 of the Bankruptcy Code and Bankruptcy Rule 9018 for Entry of an Order Authorizing LeClairRyan PLLC to File Under Seal Exhibit B to the Motion of LeClairRyan PLLC for an Entry of Interim and Final Orders Approving Settlement Procedures for Compromising Accounts Receivable and Related Relief* [ECF No. 9]
8. **“Receivables Motion”** – *Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Approving Settlement Procedures for Compromising Accounts Receivable and Related Relief* [ECF No. 8]
9. **“Wages Motion”** – *Motion of LeClairRyan PLLC for Entry of Interim and Final Orders (I) Authorizing Debtor to Pay Repetition Wages and Salaries; and (II) Directing Applicable Financial Institutions to Honor and Process Related Checks and Transfers* [ECF No. 11]

IV. CASH COLLATERAL

10. **“Cash Collateral” – Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection and Related Relief [ECF No. 13]**

Related Documents:

- a. *Declaration of Guy A. Davis in Support of Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection and Related Relief [ECF No. 14]*

DATED: September 3, 2019

Respectfully submitted,

/s/ Tyler P. Brown

Tyler P. Brown (VSB No. 28072)
Jason W. Harbour (VSB No. 68220)
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Email: tpbrown@HuntonAK.com
jharbour@HuntonAK.com

*Proposed Counsel to the Debtor
and Debtor in Possession*